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JAMES E. JOHNSON  
Corporation Counsel

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

MARTIN BOWE  
Senior Counsel  
Cell: (646) 939 7614

April 21, 2021

**VIA ECF**

Hon. Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St. New York, NY 10007

Re: *S.C. obo S.C. v. New York City Dep't of Educ.*, 21-cv-01579

Dear Judge Torres:

I am Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, attorney for Defendant in the above-referenced action wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a 30-day extension of Defendant's time to respond to the complaint, from March 23, 2021 to May 23, 2021. Plaintiff consents to this request. In addition, we respectfully request that the pretrial conference scheduled for April 26, 2021 to May 26, 2021 or a date thereafter convenient for the Court.

These are second requests to extend and adjourn these deadlines. The court denied our prior request to adjourn this conference. Defendant is confident that we will be able to begin settlement negotiations within two weeks time, and the parties are hopeful that they will fully resolve this case- as we have dozens of similar fee-only cases brought by the Dayan Firm- without burdening the Court with conferences or any motion practice whatsoever.

Accordingly, Defendant respectfully requests that its time to respond to the complaint be extended to May 24, 2021.

GRANTED. The initial pretrial conference scheduled for April 26, 2021, is ADJOURNED to **May 26, 2021**, at **10:20 a.m.** By **May 19, 2021**, the parties shall file their joint letter and proposed case management plan.

By **May 24, 2021**, Defendant shall answer or otherwise respond to the complaint.

SO ORDERED.

Dated: April 22, 2021  
New York, New York

  
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ANALISA TORRES  
United States District Judge